

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
07 March 2022 3:07 PM lrs
Michelle Rynne, Clerk of Court

Noe Raquinio

P.o.Bpox 383444

Waikoloa Hi 96738

IN THE UNITED STATES FEDERAL COURT
DISTRICT OF HAWAII

Noe Raquinio

Plaintiff,

vs.

Robert Brown , Kaena d. Horowitz

Joseph Kamelamela, Roland Talon

Defendant,

) CIVIL NO. 22-CV-00078-JMS-WRP

) AMENDED COMPLAINT

) DEMAND FOR JURY TRIAL

) CERTIFICATE OF SERVICE

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COMPLAINT DEMAND FOR JURY TRIAL

JURISDICTIONAL STATEMENT

1. This court has jurisdiction under 28 USC 1331, Federal question jurisdiction arises pursuant to 42 USC 1983.

VENUE

2. Venue is proper pursuant to 28 USC 1391 because the event giving rise to this complaint happened in this Federal District of Hawaii.

PARTIES

3. The Plaintiff Noe Raquinio in suit against the defending party's who are, Robert Brown Attorney for Partners with County of Hawaii, Kaena D. Horowitz who was representing County of Hawaii, Joseph Kamelamela, Roland Talon are also members of the Corporate Counsel of County of Hawaii. All individuals at time were all reside local residents in the State of Hawaii.

STATEMENT OF THE FACTS

4. This claim for monetary compensation for the injuries sustained by employees represented by both partnerships which led to Plaintiff injuries which occurred on Sept. 26 2020.

5. The County of Hawaii failed to start negotiations with out properly

following negotiation procedures when dealing with a victim of physical and mental suffering and resulted in 1 operation to right arm from a torn rotator cuff by Dr Reddy finally determine that my right arm is 20 % permanently damage. The operation medical cost was 8,000.00 which has been paid by The County of Hawaii.

The 20% permanent damage has not been paid to me, this amount is in controversy.

6. Dr John F graham spine specialist from Queens hospital Honolulu assets the damage to my lumbar spine which he also is waiting for HMSA approval for repair to L5 S1 lumbar disc and spine through a operation known as Lumbar spine fusion in which they install a titanium cage and basically using fancy hardware screwing bars to your spine to support its overall function while encaging it with a titanium cage which is fused together with bone. The medical cost Dr. Graham estimated will cost 175,000.00 and is also in controversy.

7. Also in controversy is the dental billing which also in result of sept. 26 2020 has left plaintiff which broke three teeth finally having to be pulled and forced to create a temporary partial denture which to restore plaintiffs smile before this incident requires 2 separate bridges and the cost is estimated by Hawaii family dental around 6,000.00 dollars.

BACKGROUND

8. All three attorneys for the Corporate Counsel administered the corruption of the original settlement agreement which based on the medical reports is clearly not in good faith because it doesn't cover the medical cost alone. I believe since defendant Horowitz never filed the original settlement agreement which was about 20 pages long, filed at a later date was a settlement agreement only 4 pages long in different format and style lettering. With that along with shady phone interviews and there lack of participation makes me believe that the original agreement was used with the defending parties insurance company which is a problem, the reason why not any party members or there attorney would supply me with the insurance information which I requested before a filed a suit , during the discovery process and so forth. Kaena D. Horowitz on that day 6 of April while negotiating was strapped to his body a original tape recorder in which he recorded the entire negotiation process. In that recording is specific terms that must be followed and if not followed in which terminates the settlement agreement.

9. Settlement Agreement has been violated by employees of any one partnerships of defendants or the company they represent and all below them, specifically have been poised gas and pesticides everyday by HPD VICE UNITS AND PEOPLE ASSOCIATED WITH THESE ENTITIES. Who trespass on to private property break in to my garage and conduct these violating crimes I considered failed hits.

Including vehicle tampering or cooling system, suspension and steering components , loosing of chassis , broken hydraulic system 1 forced to replace clutch , continuously loosing exhaust bolts emitting crankcase emission into cabin. Blown Head gasket. This was all done to my moms new 2016 Subaru wrx limited edition allwheel drive 2.0 turbocharge vehicle. HPD Vice AND THERE AFFILIATEDS HAVE ALREADY DESTROYED MY DODGE CHAGER RT 2007, MAZDASPEED PROTÉGÉ 2003, FORD RANGER SINGLE CAB PICK UP TRUCK. AND NOW 2016 SUBARU WRX THAT WAS BOUGHT NEW FROM TOYOTA DEALERSHIP.

CLAIM

10. Defendants who all involved in some transaction in one form or the other either indirectly or directly but all had knowledge over the scamming victims insurance compensation and alleges all incorporated allegations referenced in number 1-10.

REQUEST RELIEF

11. This is a straight forward request that I demand full compensation to the injuries sustained including pain and suffering and in return to my request in the correct amount based on medical evidence provided in favor in making plaintiff whole he will forever release all parties and there representatives forever from any legal action or suit in controversy indirectly or directly related to sept. 26 2020

event. Forever releasing any and all parties from further action civil or criminal permanently sealing all case related documents from the public eye.

DEMAND FOR JURY TRIAL

12. In the unsuccessful attempted in which my demands are not met, then I plaintiff demand a trial by Jury in which I will try 1 last attempted to persuade the jury and the court to rule in favor of the injured Plaintiff.

DATE: 3/7/2022

SIGN: 

Noe Raquinio

P.O.Box 383444

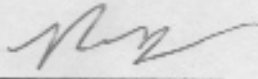
Waikoloa hi 96738

808-319-0026

CERTIFICATE OF SERVICE

I, Noe Raquinio , do hereby certify that all documents are originals therefore as filed and entered of record in the above -captioned proceedings , and are available in electronic format and accessible through the cCFM Management System.

DATE: 3/7/2022

SIGN: 

Noe Raquinio

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808-319-0026